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**RESPONSE TO COMMENTS
HAZARDOUS WASTE POST-CLOSURE FACILITY PERMIT (Permit)
AEROJET-GENERAL CORPORATION
SACRAMENTO COUNTY
MARCH 2009**

This document is the Department of Toxic Substances Control's (DTSC's) response to comments received on the draft Hazardous Waste Post-Closure Facility Permit for Aerojet-General Corporation during the public comment period ending February 18, 2009. DTSC received comments from Mr. Jim Buehler of Aerojet by e-mail on February 16, 2009 and Mr. Fred Ousey of EnviroTech Services by a letter on January 6, 2009. No other member of the public or regulatory agencies made any comments.

COMMENT 1

Mr. Buehler stated that "Attachment B for diagrams of the Permitted Units should be in last sentence. Attachment B is not mentioned elsewhere or provided in the draft permit. Diagrams could possibly be used as an attachment or inserted at the end of Attachment A".

RESPONSE TO COMMENT 1

Attachment B reference is Page 4 of the Permit.

COMMENT 2

Mr. Buehler stated that "on Page 4, Page 8, and Page 9 of the Permit, please replace, delete and/or substitute suggested language for additional clarification". Mr. Buehler's suggested changes can be reviewed as red marks in the attached draft permit.

RESPONSE TO COMMENT 2

DTSC will make the appropriate changes as suggested by Mr. Buehler which does not change the structure. The changes are all grammatical to use for additional clarification. These changes would not impact the post-closure operation or activities.

COMMENT 3

Mr. Buehler stated "The 1994 DTSC-approved Post-Closure Plan included the elements of a Sampling and Analysis Plan (SAP). The draft permit does not appear to recognize that Aerojet has been working under that SAP, which was incorporated into the Permit 97-NC-012 in 2004. The draft Post Closure Permit (II-2-d) allows DTSC to require another SAP. Is DTSC requesting a new SAP to replace the existing SAP?"

RESPONSE 4

DTSC is requesting that Aerojet provide DTSC a new SAP since there have been changes to the sampling methods and analysis, as well as regulations. Therefore, DTSC will not change Page 9, Special Condition section and is requesting a new SAP. However, DTSC will change the date of submittal of the monitoring reports from 180 days from the date of the final Permit to annual submittal on April 1 of each year.

COMMENT 4

Mr. Fred Ousey of EnviroTech Services stated that "In February 2008, we established a local office near Aerojet for the purpose of providing rental and environmental equipment services to the Aerojet. We are a drop off point for a California Laboratory named McCampbell Analytical. Aerojet uses sources outside the State of California repeatedly for their equipment purchases and rentals. This policy is in violation of the BRAC regulations that require facilities like Aerojet to make a diligent effort to use local suppliers".

RESPONSE 4

DTSC has no control over BRAC regulations; therefore DTSC can not make any comment regarding Aerojet's purchasing choices.